

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Ernie Alfonzo Lee
Olivia Knox Lee, Debtors**

**Case No. 24-01198-JAW
Chapter 13**

**JOINT DEBTOR'S CERTIFICATION AND MOTION FOR ENTRY OF CHAPTER 13
DISCHARGE PURSUANT TO 11 U.S.C. §1328 (a) and (h)**

This motion seeks an order discharging the debtor(s) pursuant to § 1328(a) of the bankruptcy code. If you oppose this motion, you must file a response with the court within twenty-one (21) days from the date listed below in the certificate of service. Your response must set forth the specific factual allegations with which you disagree, and a copy of your response must be served on the debtor(s) and debtor's(s') attorney. If no timely response is filed, the court may grant this motion without holding a hearing. A timely response is necessary for a hearing to be held.

1. By signing below, the debtors certify under penalty of perjury that the following statements are true and correct:
 - A. For cases filed on or after March 10, 2008, we have completed a personal financial management instructional course provided through an agency approved by the United States Trustee and have filed the certificate of completion provided by the course provider (in a joint case, both husband and wife must each complete the course and file a certificate of completion) or the approved personal financial management course provider has notified the court that we have completed a post-petition instructional course concerning personal financial management. **11 U.S.C. § 1328(g)**
 - B. All pre-petition amounts owed by me on domestic support obligation ("Domestic Support Obligation" as defined at 11 U.S.C §101(14A)), if any, have been paid to the extent provided by the plan. All post-petition amounts owed by me on a domestic support obligation, if any, have been paid. **11 U.S.C §1328(a)**
 - C. We have not received a discharge under chapter 7, 11 or 12 of the Bankruptcy Code in a prior case filed during the four-year period preceding the date that the petition was filed in this case. **11 U.S.C. §1328(f)(1)**
 - D. We have not received a discharge under chapter 13 of the Bankruptcy Code in a prior case filed during the two-year period before the date that the petition was filed in this case. **11 U.S.C. §1328(f)(2)**
 - E. We have not been convicted of a felony, the circumstances of which would demonstrate that the filing of this bankruptcy case constituted an abuse of the provisions of the Bankruptcy Code. **11 U.S.C. §1328(h)(1) and §522(q)(1)(A)**
 - F. If we owe a debt arising from: (i) any violation of any State or Federal securities laws, regulations or orders, (ii) fraud, deceit or manipulation in a fiduciary capacity or in connection with the purchase or sale of any security, (iii) a civil remedy under 1964 of Title 18 of the United States Code, or (iv) that caused serious injury or death to another individual in the preceding five (5) years, in the preceding five (5) years, then we have not claimed an exemption for my/our residence in an amount in excess of the statutory

cap as prohibited by §522(q)(1) of the Bankruptcy Code. **11 U.S.C. §1328(h)(1) and §522(q)(1)(B)**

G. No proceeding is pending in which we may be found guilty of a felony of the kind described in §522(q)(1)(A) or in which we may be found liable for a debt of the kind described in §522(q)(1)(B). **11 U.S.C. §1328(h)(2)**

H. We have made all payments required by my confirmed Chapter 13 plan.

2. Debtors hereby move the court for the entry of a discharge order in this case.

Signed: /s/ Byron Poindexter as next friend for Olivia Knox Lee 05-14-2025
Olivia Knox Lee Date

/s/ Thomas C. Rollins, Jr. 05-14-2025
Thomas C. Rollins, Jr., MS Bar No. 103469 Date
Attorney for the Debtors
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601.500.5533

3. Mailing address for filing responses:

Jackson Office:
Danny L. Miller, Clerk
United States Bankruptcy Court
Thad Cochran US Courthouse
501 E Court St, Ste 2.300
Jackson, MS 39201

Gulfport Divisional Office:
Danny L. Miller, Clerk
United States Bankruptcy Court
Dan M. Russell, Jr. U.S. Courthouse
2012 15th St, Suite 244
Gulfport, MS 39501

CERTIFICATE OF SERVICE

On May 21, 2025 a copy of this pleading was served on each of the persons listed on the attached service list either by prepaid United States mail or via electronic service through the Court's EM/ECF system at the mailing addresses and/or email addresses indicated.

/s/ Thomas C. Rollins, Jr. _____
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

ERNIE ALFONZO LEE
OLIVIA KNOX LEE

CASE NO: 24-01198

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 5/21/2025, I did cause a copy of the following documents, described below,
Motion for Entry of Chapter 13 Discharge

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 5/21/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

ERNIE ALFONZO LEE
OLIVIA KNOX LEE

CASE NO: 24-01198

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 5/21/2025, a copy of the following documents, described below,

Motion for Entry of Chapter 13 Discharge

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 5/21/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 24-01198
SOUTHERN DISTRICT OF MISSISSIPPI
TUE MAY 20 15-8-47 PST 2025

CITIMORTGAGE INC
425 PHILLIPS BLVD
EWING NJ 08618-1430

(P)TRUSTMARK NATIONAL BANK
P O BOX 1928
BRANDON MS 39043-1928

~~EXCLUDE~~

~~(U)US BANK TRUST NATIONAL ASSOCIATION
NOT IN F~~

~~EXCLUDE~~

~~US BANKRUPTCY COURT
THAD COCHRAN US COURTHOUSE
501 E COURT STREET
SUITE 2300
JACKSON MS 39201-5036~~

ALPHONSO WRIGHT
5942 WESTMORE DRIVE
JACKSON MS 39206-2209

ALPHONZO WRIGHT
5942 WESTMORE DRIVE
JACKSON MS 39206-2209

AMERICAN EXPRESS NATIONAL BANK
CO BECKET AND LEE LLP
PO BOX 3001
MALVERN PA 19355-0701

AMEX
CORRESPONDENCEBANKRUPTCY
PO BOX 981540
EL PASO TX 79998-1540

BAPTIST
PO BOX 23090
JACKSON MS 39225-3090

BAPTIST MEDICAL GROUP
PO BOX 74533
ATLANTA GA 30384-5333

CARMAX AUTO FINANCE
ATTN BANKRUPTCY
1200 TUCKAHOE CREEK PK
RICHMAN VA 23238

(P)CARMAX AUTO FINANCE
225 CHASTAIN MEADOWS COURT SUITE 200
KENNESAW GA 30144-5938

(P)CREDIT CONTROL LLC
ATTN CORRESPONDENCE
3300 RIDER TRAIL S
SUITE 500
EARTH CITY MO 63045-1338

CITIMORTGAGE INC
CENLAR FSB
ATTN BK DEPT
425 PHILLIPS BLVD
EWING NJ 08618-1430

CITIBANK
PO BOX 790040
ST LOUIS MO 63179-0040

EILEEN N SHAFFER ESQ
FOR ALPHONSO WRIGHT
POST OFFICE BOX 1177
JACKSON MS 39215-1177

KIMBERLY D PUTNAM
DEAN MORRIS LLC
FOR CITIMORTGAGE INC
1820 AVENUE OF AMERICA
MONROE LA 71201-4530

QUINN HEALTHCARE
768 N AVERY BLVD
RIDGELAND MS 39157-5219

RESURGENT RECEIVABLES LLC
RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587

RIVER OAKS
PO BOX 17235
MEMPHIS TN 38187-0235

SHELLPOINT MORTGAGE
ATTN BANKRUPTCY
PO BOX 10826
GREENVILLE SC 29603-0826

ST DOMINC
PO BOX 321472
FLOWOOD MS 39232-1472

SYNCCBCARE CREDIT
ATTN BANKRUPTCY
PO BOX 965064
ORLANDO FL 32896-5064

~~EXCLUDE~~

~~(D) (P)TRUSTMARK NATIONAL BANK
P O BOX 1928
BRANDON MS 39043-1928~~

~~EXCLUDE~~

~~(D) (P)TRUSTMARK NATIONAL BANK
P O BOX 1928
BRANDON MS 39043-1928~~

UMC
2500 N STATE ST
JACKSON MS 39216-4505

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

US BANK ET AL
NEWREZ LLC DBA SHELLPOINT MORTGAGE
SERVI
BANKRUPTCY DEPARTMENT
PO BOX 10826
GREENVILLE SC 29603-0826

US BANK ET AL
NEWREZ LLC DBA SHELLPOINT ET AL
BANKRUPTCY DEPARTMENT
PO BOX 10826
GREENVILLE SC 29603-0826

~~EXCLUDE~~

~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6-430
JACKSON MS 39201-5022~~

WELLS FARGO BANK NA
PO BOX 10438 MAC F823502F
DES MOINES IA 50306-0438

WF BANK NA
ATTN BANKRUPTCY
PO BOX 14517
DES MOINES IA 50306-3517

WILSON ASSOCIATES
1521 MERRILL DR
STE D-220
LITTLE ROCK AR 72211-1654

~~EXCLUDE~~

~~(U) ALPHONGO WRIGHT~~

DEBTOR

ERNIE ALFONZO LEE
5027 KAY BROOK DR
BYRAM MS 39272-9608

JENNIFER A CURRY CALVILLO
THE ROLLINS LAW FIRM
702 W PINE ST
HATTIESBURG MS 39401-3836

OLIVIA KNOX LEE
5027 KAY BROOK DR
BYRAM MS 39272-9608

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236-3767~~

~~EXCLUDE~~

~~TORRI PARKER MARTIN
TORRI PARKER MARTIN CHAPTER 13
BANKRUPT
200 NORTH CONGRESS STREET STE 400
JACKSON MS 39201-1902~~